

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Melanie Kenderdine**  
Cabinet Secretary

**Ben Shelton**  
Deputy Secretary (Acting)

**Gerasimos "Gerry" Razatos**  
Division Director (Acting)  
Oil Conservation Division



Darin Savage  
[darin@abadieschill.com](mailto:darin@abadieschill.com)

**ADMINISTRATIVE NON-STANDARD LOCATION**

**Administrative Order NSL – 8885**

**WPX Energy Permian, LLC [OGRID 246289]  
Clawhammer 33 28 21 Federal Com Well No. 323H  
API No. 30-015-PENDING**

Reference is made to your application received on February 19<sup>th</sup>, 2025.

**Proposed Location**

	<u>Footages</u>	<u>Unit/Lot</u>	<u>Sec.</u>	<u>Twsp</u>	<u>Range</u>	<u>County</u>
Surface	447 FSL & 2354 FWL	F/3	33	26S	30E	Eddy
First Take Point	100 FSL & 2460 FWL	F/3	33	26S	30E	Eddy
Last Take Point	2540 FNL & 2460 FWL	K	21	26S	30E	Eddy
Terminus	2620 FSL & 2460 FWL	K	21	26S	30E	Eddy

**Proposed Horizontal Units**

<u>Description</u>	<u>Acres</u>	<u>Pool</u>	<u>Pool Code</u>
W/2 Section 33	601.5	Wildcat; Bone Spring	97863
W/2 Section 28			
SW/4 Section 21			

You have requested to drill this horizontal well at an unorthodox well location described above in the referenced pool or formation. 19.15.16.15(B)(1)(a) NMAC governs this proposed well and provides that the operator shall dedicate to each horizontal **oil** well a standard horizontal spacing unit that comprises of one or more contiguous tracts that the horizontal well's completed interval penetrates, each of which consists of a governmental quarter - quarter section or equivalent. 19.15.16.15(C)(1)(a) NMAC governs the distance in the horizontal plane from any point in the completed interval to any outer boundary of the horizontal spacing unit, measured along a line perpendicular to the completed interval or to the tangent thereof, shall be a minimum of 330 feet for an **oil** well. 19.15.16.15(C)(1)(b) NMAC governs the first and last take point of a horizontal

Administrative Order NSL – 8885  
WPX Energy Permian, LLC  
Page 2 of 2

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well shall be no closer than 100 feet in the horizontal plane, to any outer boundary of the horizontal spacing unit.

The request to deviate from an orthodox location has met all requirements of 19.15.16.15 (C)(5)(a) NMAC. It is understood that you are seeking this exception in order to create a non-standard location, comprised of Take Points referenced above, within the described Horizontal Spacing Unit.

This well's completed interval is as close as 180 feet to the eastern edge of the horizontal spacing unit. Encroachment will impact the following tracts.

- Section 33, encroachment to the W/2 E/2
- Section 28, encroachment to the W/2 E/2
- Section 21, encroachment to the W/2 E/2

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in 19.15.2.7(A)(8) NMAC, in all adjoining units towards which the proposed location encroaches. It is understood that the affected tracts are a 100% W.I. to the applicant of this application, therefore the notice period does not apply.

The Division understands you are seeking this unorthodox location in order to minimize reserves left in the ground while preventing waste, and to protect the correlative rights within the Bone Spring formation underlying the W/2 of Section 33, W/2 of Section 28 and the SW/4 of Section 21.

Your application has been filed under 19.15.16.15(C)(6) NMAC, 19.15.15.13 NMAC and 19.15.4.12 (A)(2) NMAC.

Per 19.15.15.13 (B) NMAC, **Division approves this unorthodox location.**

Reference this NSL order number on the As Drilled C-102 submitted with the Authorization to Transport, to place this well into production.

The above approvals are subject to your following all other applicable Division rules.

Jurisdiction of this case is retained for the entry of further orders as the Division deems necessary.



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**GERASIMOS RAZATOS**  
**DIRECTOR (ACTING)**  
GR/lrl

**Date:** 3/19/2025

ID NO. 433639

**NSL - 8885**

Revised March 23, 2017

RECEIVED: <b>02/19/25</b>	REVIEWER:	TYPE:	APP NO: <b>pLEL2505830820</b>
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Applicant:** WPX Energy Permian, LLC **OGRID Number:** 246289  
**Well Name:** Clawhammer 33-28-21 Federal Com 323H Well **API:** 30-015-Pending  
**Pool:** Wildcat G-03 S263016K; Bone Spring Pool **Pool Code:** 97863

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]  
 A. Location – Spacing Unit – Simultaneous Dedication  
 NSL       NSP<sub>(PROJECT AREA)</sub>       NSP<sub>(PRORATION UNIT)</sub>       SD
- B. Check one only for [ I ] or [ II ]  
 [ I ] Commingling – Storage – Measurement  
 DHC     CTB     PLC     PC     OLS     OLM  
 [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery  
 WFX     PMX     SWD     IPI     EOR     PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.  
 A.  Offset operators or lease holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

<b>FOR OCD ONLY</b>	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

- 3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

January 16, 2025

Darin Savage

\_\_\_\_\_ Date

Print or Type Name

970-385-4401

/s/ Darin Savage

\_\_\_\_\_ Phone Number

darin@abadieschill.com

Signature

\_\_\_\_\_ e-mail Address

**SUBMITTED TO THE OIL CONSERVATION DIVISION:**

Application of WPX Energy Permian, LLC, for administrative approval of unorthodox well location for its **Clawhammer 33-28-21 Federal Com 323H Well** located in Lots 3 and 4 and the N/2NW/4 of Section 33, the W/2 of Section 28, and the SW/4 of Section 21, all in Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.

**TABLE OF CONTENTS**

Administrative Checklist for NSL

- Exhibit A: C-102 Forms, specifically identifying the NSL (19.15.15.13C)
- Exhibit B: A statement discussing the reasons for the unorthodox location (19.15.15.13C)
- Exhibit C: Tract map outlining the unit location of the unorthodox well with affected area tracts identified (19.15.15.13C)
- Exhibit D: A list of affected persons and parties, with addresses, entitled to notice of the application, along with a copy of the notice letter sent to affected persons and parties (19.15.15.13C)

**WPX Energy Permian, LLC**



For the Pursuit of Energy

ABADIE | SCHILL PC

Colorado	New Mexico
Louisiana	Texas
Nebraska	Kansas
Montana	Wyoming
Oklahoma	California
	North Dakota

February 19, 2025

Gerasimos Razatos, Director (Acting)  
 Oil Conservation Division  
 New Mexico Department of Energy  
 Minerals and Natural Resources  
 1220 South Saint Francis Drive  
 Santa Fe, New Mexico 87505

Copy to: Leonard Lowe, Division Technical Examiner

**Re: Application of WPX Energy Permian, LLC, for administrative approval of unorthodox well location for its Clawhammer 33-28-21 Federal Com 323H Well located in Lots 3 and 4 and the N/2NW/4 of Section 33, the W/2 of Section 28, and the SW/4 of Section 21, all in Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.**

Dear Acting Director Razatos:

WPX Energy Permian, LLC, (“WPX”), OGRID No. 246289, is seeking administrative approval of an unorthodox well location (“NSL”) for the Clawhammer 33-28-21 Federal Com 323H Well (the “323H Well”) (API No. 30-015-Pending) to be completed within the Wildcat G-03 S263016K; Bone Spring Pool (Pool Code 97863) underlying a standard 609.5-acre unit comprised of Lots 3 and 4 and the N/2NW/4 of Section 33, the W/2 of Section 28, and the SW/4 of Section 21, all in Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- Surface Location (SL): 447’ from the South line and 2354’ from the West line (Lot 3) of Section 33, Township 26 South, Range 30 East;
- Bottom Hole Location (BHL): 2620’ from the South line and 2460’ from the West line (Unit K) of Section 21, Township 26 South, Range 30 East;
- First Take Point (FTP): 100’ from the South line and 2460’ from the West line (Lot 3) of Section 33, Township 26 South, Range 30 East;
- Last Take Point (LTP): 2540’ from the South line and 2460’ from the West line (Unit K) of Section 21, Township 26 South, Range 30 East.

[abadieschill.com](http://abadieschill.com)

214 McKenzie Street, Santa Fe, New Mexico, 87501

O : 970.385.4401 • F : 970.385.4901

WPX has included as Exhibit B, a letter explaining why this application is needed. This well will produce from the Wildcat G-03 S263016K; Bone Spring Pool (Pool Code 97863). The statewide rules establish 330' foot perpendicular setback requirements for the completed interval. The completed interval for the proposed well will be closer than 330' from the boundary of the spacing unit.

The unorthodox location will encroach towards Lot 2 and the NW/4NE/4 of Section 33, the W/2E/2 of Section 28, and the W/2SE/4 of Section 21, all in Township 26 South, Range 30 East.

WPX attests that, on or before submission of this application, it provided notice to the affected persons in (1) the adjoining horizontal spacing unit which covers Lot 2 and the NW/4NE/4 of Section 33 and the W/2E/2 of Section 28, and (2) the adjoining horizontal spacing unit which covers the W/2E/2 of Section 21, all in Township 26 South, Range 30 East.; said notice as described satisfies all provisions of 19.15.4.12A(2) NMAC; copies of the application and required plat maps were furnished. WPX has also provided notice to the Bureau of Land Management to the extent that federal leases are involved, pursuant to 19.15.2.7A(8)(d) NMAC. WPX provides herein a sectional map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to listed affected persons and parties, is attached hereto as Exhibit D. WPX has not identified a pooling case associated with this application.

Your consideration in this matter is appreciated.

Sincerely,



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Darin C. Savage  
Attorney for Applicant

C-102  Submit Electronically Via OCD Permitting	State of New Mexico <b>Energy, Minerals &amp; Natural Resources Department</b> <b>OIL CONSERVATION DIVISION</b>	Revised July, 2024
	Submittal Type: <input checked="" type="checkbox"/> Initial Submittal <input type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled	

**WELL LOCATION INFORMATION**

API Number	Pool Code 97863	Pool Name Wildcat G-03 S263016K; Bone Spring
Property Code	Property Name CLAWHAMMER 33-28-21 FED COM	Well Number 323H
OGRID No. 6137	Operator Name WPX ENERGY PERMIAN, LLC.	Ground Level Elevation 2958.0'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

**Surface Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	33	26-S	30-E	3	447' S	2354' W	32.001362	103.887194	EDDY

**Bottom Hole Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
K	21	26-S	30-E		2620' S	2460' W	32.027864	103.886935	EDDY

Dedicated Acres	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
Order Numbers			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

**Kick Off Point (KOP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

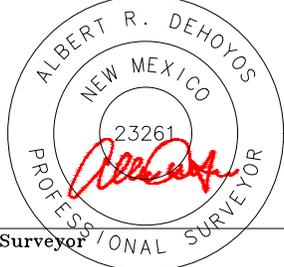
**First Take Point (FTP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	33	26-S	30-E	3	100' S	2460' W	32.000408	103.886852	EDDY

**Last Take Point (LTP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
K	21	26-S	30-E		2540' S	2460' W	32.027644	103.886933	EDDY

	Spacing Unit Type	Horizontal	Vertical	Ground Floor Elevation:
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<p><b>OPERATOR CERTIFICATIONS</b></p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p>If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.</p>	<p><b>SURVEYOR CERTIFICATIONS</b></p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under supervision, and that the same is true and correct to the best of my belief.</p> <div style="text-align: center;">  </div>
Signature _____ Date _____	Signature and Seal of Professional Surveyor
Printed Name _____	Certificate Number 23261 Date of Survey 10/2024
Email Address _____	



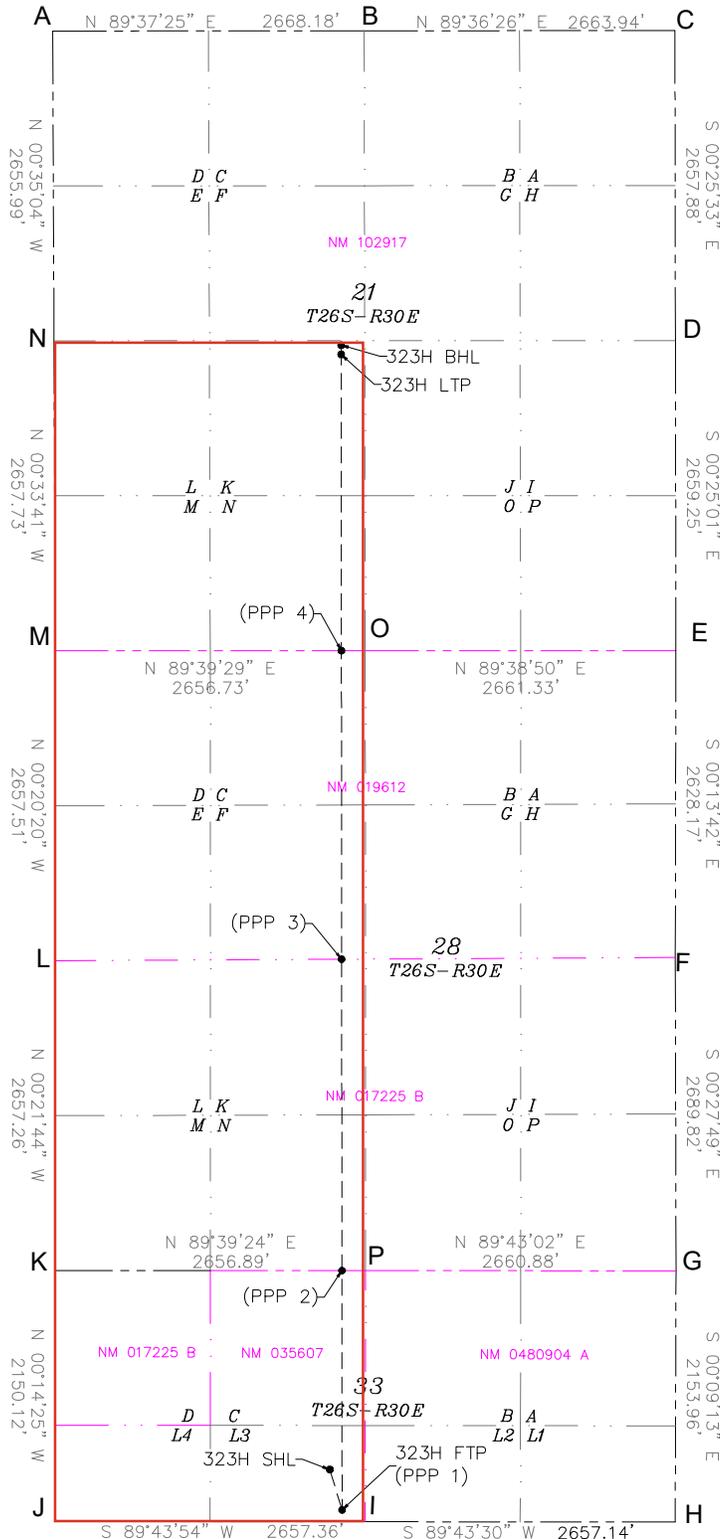
ACREAGE DEDICATION PLATS

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.

CLAWHAMMER 33-28-21 FEDERAL COM 323H GEODETIC COORDINATES NAD 83 NMSP EAST SURFACE LOCATION 447' FSL 2354' FWL SECTION 33 EL: 2958.0' N: 364520.16/E: 679633.85 LAT: 32.001362/LON: 103.887194
KICK OFF POINT CALLS: _____ N: _____/E: _____ LAT: _____/LON: _____
FIRST TAKE POINT 100' FSL 2460' FWL SECTION 33 N: 364173.66/E: 679741.31 LAT: 32.000408/LON: 103.886852
LAST TAKE POINT 2540' FSL 2460' FWL SECTION 21 N: 374081.50/E: 679675.31 LAT: 32.027644/LON: 103.886933
BOTTOM HOLE LOCATION 2620' FSL 2460' FWL SECTION 21 N: 374161.50/E: 679674.53 LAT: 32.027864/LON: 103.886935
PPP 2 0' FSL 2455' FWL SECTION 28 N: 366226.95/E: 679727.63 LAT: 32.006052/LON: 103.886869
PPP 3 2670' FSL 2454' FWL SECTION 28 N: 368896.50/E: 679709.85 LAT: 32.013391/LON: 103.886891
PPP 4 0' FSL 2452' FWL SECTION 21 N: 371541.55/E: 679692.23 LAT: 32.020662/LON: 103.886912

A=N: 376840.37	E: 677187.09
B=N: 376857.90	E: 679855.21
C=N: 376876.15	E: 682519.09
D=N: 374218.35	E: 682538.83
E=N: 371559.16	E: 682558.19
F=N: 368928.02	E: 682568.68
G=N: 366241.29	E: 682590.42
H=N: 364087.34	E: 682596.19
I=N: 364074.58	E: 679939.09
J=N: 364062.14	E: 677281.75
K=N: 366212.24	E: 677272.74
L=N: 368869.45	E: 677255.94
M=N: 371526.92	E: 677240.22
N=N: 374184.52	E: 677214.19
O=N: 371542.78	E: 679896.90
P=N: 366228.16	E: 679929.58





Devon Energy Production Company, L.P.  
333 West Sheridan Avenue  
Oklahoma City, OK 73102-5015

January 21, 2025

Mr. Leonard Lowe  
New Mexico Oil Conservation Division  
1220 South Francis Drive  
Santa Fe, New Mexico 87505

RE: Application for Nonstandard Location  
Engineering Statement  
WPX Energy Permian, LLC  
Clawhammer 33-28-21 Fed Com well 323H  
SW/4 of Sec. 21, W/2 of Secs. 28 & 33  
Township 26 South, Range 30 East  
Eddy County, New Mexico

Dear Mr. Lowe:

WPX Energy Permian, LLC, a wholly owned subsidiary of Devon Energy Corporation, respectfully requests administrative approval of a nonstandard location for the Clawhammer Well referenced above. This well is in the Wildcat G-03 S263016K; Bone Spring Pool (Pool Code 97863). It is WPX's responsibility as a prudent operator to minimize reserves left in the ground. Decreasing the completed interval setback from three hundred and thirty feet (330') to one hundred and eighty feet (180') will allow for more optimal spacing within the unit thereby increasing ultimate recovery of reserves and thereby preventing waste of natural resources.

Sincerely,

Camden Selvidge  
Reservoir Engineer

A handwritten signature in black ink, appearing to read "Camden Selvidge". The signature is written in a cursive, flowing style.

EXHIBIT  
B

**Clawhammer 33-28-21 Federal Com 323H: NSL Affected Offset Units**



EXHIBIT  
**C**

USPSArticleNumber	DateMailed	Name1	Address1	City	State	Zip
9314869904300131695148	2/19/25	Kala Denise Jiles Schmidt	6821 Island Circle	Midland	TX	79707
9314869904300131695155	2/19/25	Bureau of Land Management	620 E. Greene Street	Carlsbad	NM	88220-6292
9314869904300131695162	2/19/25	Jay Edward Jiles	208 Pebble Ridge Ct.	Crasson	TX	76035





For the Pursuit of Energy

ABADIE | SCHILL PC

Colorado	New Mexico
Louisiana	Texas
Nebraska	Kansas
Montana	Wyoming
Oklahoma	California
	North Dakota

February 19, 2025

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**NOTICE TO AFFECTED PERSONS/PARTIES  
RE: APPLICATIONS FOR ADMINISTRATIVE  
APPROVAL OF UNORTHODOX WELL LOCATION**

**Re: Application of WPX Energy Permian, LLC, for administrative approval of unorthodox well location for its Clawhammer 33-28-21 Federal Com 323H Well located in Lots 3 and 4 and the N/2NW/4 of Section 33, the W/2 of Section 28, and the SW/4 of Section 21, all in Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.**

To the Parties/Persons this may concern:

Enclosed in this notice are copies of the above referenced application filed with the New Mexico Conservation Division on the date referenced above.

You are being notified in your capacity as a person or party in an adjoining tract or unit pursuant to our request for approval of an unorthodox location of the above-referenced well. Any objections that you have to one or more of these applications must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, within twenty (20) days from the date the Division receives the applications filed for administrative approval by the Division. Email correspondence for this matter can be sent to the Division at [OCD.Engineer@emnrd.nm.gov](mailto:OCD.Engineer@emnrd.nm.gov).

If you have any questions concerning this application, please contact:

Tim Prout  
Sr. Staff Landman  
Devon Energy Production Company, L.P.  
(405) 552-6113  
[Tim.Prout@dvn.com](mailto:Tim.Prout@dvn.com)

[abadieschill.com](http://abadieschill.com)

214 McKenzie Street, Santa Fe, New Mexico, 87501

O : 970.385.4401 • F : 970.385.4901

If you have no objections to these applications, please sign the waiver as indicated below and return the original to the address listed on this letterhead. Your assistance and cooperation in this matter are appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darin C. Savage', written over a horizontal line.

Darin C. Savage

Attorney for WPX Energy  
Permian, LLC

Waiver

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the Clawhammer 33-28-21 Federal Com 323H Well located in Lots 3 and 4 and the N/2NW/4 of Section 33, the W/2 of Section 28, and the SW/4 of Section 21, all in Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 433639

**CONDITIONS**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 433639
	Action Type: [UF-NSL] Non-Standard Location (NSL)

**CONDITIONS**

Created By	Condition	Condition Date
llowe	None	2/27/2025